UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: GLEN LLEWELLYN JENKINS : CHAPTER 13
       Debtor :
     :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
       Movant :
     :
      vs. :
     :
GLEN LLEWELLYN JENKINS :
       Respondent : CASE NO. 4-23-bk-02808

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

      AND NOW, this 11th day of October, 2024 comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

      1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

      a. Insufficient Monthly Net Income as indicated on Schedules I and J.
      b. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court.   More specifically, the mortgage arrears in the plan are less than the amount stated in the mortgage creditor's Proof of Claim.
      c. The payments in this case were supposed to start in February, 2024 and the end date for payments in this Amended Plan is November, 2029 which exceeds the statutory limit of 60 months for a Chapter 13 Plan.

      WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

      a. Deny confirmation of debtor(s) plan.

b. Dismiss or convert debtor(s) case.
c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this   11th   day of October, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Glen Llewellyn Jenkins
P.O. Box 914
State College, PA   16804-0914

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee